

1 Matthew I. Knepper, Esq.
Nevada Bar No. 12796
2 Miles N. Clark, Esq.
Nevada Bar No. 13848
3 KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
4 Las Vegas, NV 89148
Phone: (702) 856-7430
5 Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
6 Email: miles.clark@knepperclark.com

7
8 David H. Krieger, Esq.
Nevada Bar No. 9086
9 KRIEGER LAW GROUP, LLC
2850 W. Horizon Ridge Parkway, Suite 200
10 Henderson, NV 89052
Phone: (702) 848-3855, Ext. 101
11 Email: dkrieger@kriegerlawgroup.com

12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 CECELIA BARO,

16 Plaintiff,

17 v.

18 THE RETAIL EQUATION,

19 Defendant.
20

Case No. 2:20-cv-00724-RFB-NJK

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO RESPOND TO
MOTION TO DISMISS**

[FIRST REQUEST]

Complaint filed: April 22, 2020

21 Plaintiff Cecelia Baro ("Plaintiff"), by and through her counsel of record, and Defendant
22 The Retail Equation ("Retail Equation") have agreed and stipulated to the following:

- 23 1. On April 22, 2020, Plaintiff filed a Complaint [ECF Dkt. 1].
24 2. On June 15, 2020, Retail Equation filed a Motion to Dismiss the Complaint [ECF
25 Dkt.11].
26 3. Plaintiff's Response is due June 29, 2020.
27
28

4. Plaintiff and Retail Equation have agreed to extend Plaintiff's response fourteen days in order to allow more time to investigate facts and circumstances, and to extend Retail Equation's deadline to file a reply in support of its motion for fourteen days for the same reasons. As a result, both Plaintiff and Retail Equation hereby request this Court to further extend the date for Plaintiff to respond to Retail Equation's Motion to Dismiss Complaint until **July 13, 2020**, and to extend the date for Retail Equation to file their Reply until **July 27, 2020**.

5. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

Dated June 29, 2020

KNEPPER & CLARK LLC

/s/ Miles N. Clark

Matthew I. Knepper, Esq., SBN 12796
Miles N. Clark, Esq., SBN 13848
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148
Email: Matthew.Knepper@knepperclark.com
Email: Miles.Clark@knepperclark.com

KRIEGER LAW GROUP, LLC

David H. Krieger, Esq., SBN 9086
2850 W. Horizon Ridge Parkway, Suite 200
Henderson, NV 89052
Email: DKrieger@kriegerlawgroup.com
Counsel for Plaintiff

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ J. Christopher Jorgensen

J. Christopher Jorgensen, Esq., SBN 5382
Matthew R. Tsai, Esq., SBN 14290
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996
Email: CJorgensen@lrrc.com
Email: MTsai@lrrc.com

MAYER BROWN LLP

John Nadolenco, Esq.
(Admitted Pro Hac Vice)
Email: JNadolenco@mayerbrown.com
Daniel D. Queen, Esq.
(Admitted Pro Hac Vice)
Email: DQueen@mayerbrown.com
350 South Grand Avenue, 25th Floor
Los Angeles, California 90071
Counsel for Defendant The Retail Equation

ORDER GRANTING

STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS AND FOR DEFENDANT TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 29th day of June, 2020.